

April 26, 2021

Via ECF

Hon. Anne Y. Shields
U.S. District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Board of Commissioner of Manhasset-Lakeville Water District v. The 3M Co., et. al.*, Case No. 20-cv-5749 GRB-AYS;
Town of Hempstead v. The 3M Co., et al., Case No.: 20-cv-5785 GRB-AYS;
Town of Riverhead v. The 3M Co., et al., Case No. 21-cv-1034 GRB-AYS;
Related to *In re: Nassau County Water District Cases*,
Case No. 2:19-cv-4608-GRB-AYS

Dear Judge Shields:

With the consent of all parties, Plaintiffs write to respectfully request that the initial status conferences currently set in cases 20-cv-5749 and 20-cv-5785 (Dkts. 22) for May 13, 2021 and in case 21-cv-1034 (Dkt. 15) for May 18, 2021 be adjourned for the following reasons.

The above referenced cases are related to case no. 2:19-cv-4608, *In re: Nassau County Water District Cases*, and were referred to Your Honor for Threshold Discovery coordination following the parties' February 24, 2021 hearing with Judge Brown. Thereafter, the parties submitted a Joint Threshold Discovery Schedule for cases 20-cv-5749 and 20-cv-5785 on March 9, 2021 (Dkt. 87), which Your Honor granted via text order on March 10, 2021. On March 23, 2021, the parties submitted a Joint Threshold Discovery Schedule for case 21-cv-1034 (Dkt. 88), which Your Honor granted via text order on March 24, 2021. As such, the above referenced cases are currently engaged in Threshold Discovery and are on the same discovery schedule set forth for all cases in the matter *In re: Nassau County Water District Cases*. Your Honor has also set a further discovery conference with the parties on May 26, 2021 regarding the Threshold Discovery for all of the related cases, during which the parties are planning to report on various Threshold Discovery items, most of which obviates the topics to be covered in an initial conference.

For the reasons stated above, we respectfully request that the Court vacate the initial conferences set for cases 20-cv-5749, 20-cv-5785, and 21-cv-1034.

Respectfully Submitted,

/s/ Stephanie D. Biehl

Stephanie D. Biehl
Counsel for Plaintiffs

cc: Counsel of record (via ECF)